TECHNICAL REVIEW DOCUMENT

For Renewal of

OPERATING PERMIT 96OPWE162

to be issued to:

Metal Container Corporation - Windsor Facility
Weld County
Source ID 1230134

June 3, 2003

Purpose

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the renewed Operating Permit proposed for this site. The original Operating Permit was issued September 1, 1998, and expires on September 1, 2003. This document is designed for reference during review of the proposed permit by the EPA, the public and other interested parties. The conclusions made in this report are based on information provided in the permit renewal application submitted on September 3, 2002, previous inspection reports and various e-mail correspondence, as well as telephone conversations with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at http://www.cdphe.state.co.us/ap/Titlev.html. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit renewal application have been reviewed in accordance with the requirements of Colorado Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This Operating Permit incorporates and shall be considered to be a combined Construction/Operating Permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this Operating Permit without applying for a revision to this permit or for an additional or revised Construction Permit.

Source Description

This source is classified as an aluminum beverage can manufacturer defined under Standard Industrial Classification 3411. Metal Container Corporation manufactures the bodies of 2 piece-aluminum beverage cans. The plant has two process lines (Lines No. 1 and 2) that have emissions from natural gas fired ovens/boilers, can forming equipment, surface coating operations and miscellaneous combustion sources. Each process line consists of a front-end and back-end operation. The front-end includes cupping and bodymaking units that form cans from aluminum coil, followed by washers that clean the can bodies for decorating. Boilers supply the low pressure hot water for the washers. The back-end comprises the surface coating operations. A portion of the cans produced are basecoated and cured in a natural gas-fired oven before being routed to decorators where the exterior of the can is printed with high solid inks. Cans that are not basecoated are routed directly to the decorators and then cured in natural gas-fired ovens. The cans are then roll-coated

with a water-based overvarnish and rim varnish before again being cured in natural gas-fired ovens. The inside of the can is sprayed with a water-based coating and cured in natural gas-fired ovens. Following the coating operations, the cans are necked, reformed, tested, and palletized prior to warehousing for shipment. Miscellaneous combustion sources are used to supply building heat.

The facility is located in Weld County, southeast of Windsor on the north side of County Road 66 in the Windsor Industrial Park. The area in which the plant operates is designated as attainment for all criteria pollutants. There is one affected state within 50 miles of the plant: Wyoming. The following Federal Class I designated areas are within 100 kilometers of the plant: Rawah Wilderness Area and Rocky Mountain National Park. Facility-wide potential emissions based on data submitted with the Title V application and actual emissions based on the APENs on file with the Division are as follows:

Pollutant	Potential Emissions	Actual Emissions
	Tons Per Year	Tons Per Year
NO_x	82.2	42.9
CO	46.0	10.7
VOC	245.0	200
SO_2	4.9	*
PM	11.0	3.6
PM_{10}	11.0	3.6
HAPs	---	111.1

* Source just added to inventory

A facility-wide Construction Permit has been issued to this source that limits total Volatile Organic Compounds (VOC) emissions to a maximum of 245 tons per year (TPY). Based on the information provided, the source is currently considered to be a synthetic minor stationary source for purposes of Prevention of Significant (PSD) regulations (as defined in Colorado Regulation No. 3, Part A, Section I.B.58) because the Construction Permit limits the Potential to Emit for the emissions to less than 250 TPY. The source may not exceed the 250 TPY limit for any regulated pollutant unless a permit is first obtained to comply with PSD rules.

Under the Federal Clean Air Act (the Act), EPA is charged with promulgating maximum achievable control technology (MACT) standards for major sources of hazardous air pollutants (HAPs) in various source categories by certain dates. Section 112(j) of the Act requires that permitting authorities develop a case-by-case MACT for any major sources of HAPs in source categories for which EPA failed to promulgate a MACT standard by May 15, 2002. These provisions are commonly referred to as the "MACT hammer".

Owners or operators that could reasonably determine that they are a major source of HAPs which includes one or more stationary sources included in the source category or subcategory for which the EPA failed to promulgate a MACT standard by the section 112(j) deadline were required to submit a Part 1 permit application by May 1, 2002. Based on the information provided by this source, Metal Container is a major stationary source of HAPs (i.e. facility-wide potential to emit of greater than 10

tons per year of any single HAP or greater than 25 tons per year of all HAPs combined) for a covered source category (Metal Can Coating & Boilers/Process Heaters) and did submit a Part 1 application to the Division prior to May 15, 2002. As of the date of issuance of this permit, a Part 2 application is due by May 1, 2003. That date, however, may be revised by the outcome of on-going legal activities between EPA and interested parties. Affected facilities that fail to submit a timely and complete application will be considered in violation and such violations may be subject to enforcement action.

Section 112(r) of the Clean Air Act mandates a new federal focus on the prevention of chemical accidents. Sources subject to these provisions must develop and implement risk management programs that include hazard assessment, a prevention program, and an emergency response program. They must prepare and implement a Risk Management Plan (RMP) as specified in the Rule. Based on the information provided by the applicant, this facility is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act).

Emission Sources

The previous Title V permit simplified monitoring and reporting by grouping the sources into fuel combustion sources, can forming and can coating. For this renewal of the Operating Permit the aluminum scrap processing is identified as a separate source. Inspections of the plant discovered a diesel engine driven compressor unit is brought to the plant to operate while the plant compressors are serviced. The facility-wide construction permit was modified to incorporate the engine emissions. The aluminum scrap processing and the compressor engine are being identified as separate sources to facilitate monitoring and reporting. The emission factors for these two sources do not allow grouping with other sources at the facility.

FUEL BURNING EQUIPMENT

Units B001 and B002: Cleaver Brooks Boilers, 12.553 MMBtu/hr, Natural Gas Fired, Model CB 700-300; Serial Numbers L83229 and L83228.

Unit B003: Industrial Sheet Metal & Mechanical Make-up Air Heaters, Natural Gas Fired, Two (2) 10.3 MMBtu/hr units and one (1) 13.1 MMBtu/hr unit, Serial Numbers 223-110-090, 223-110-091, 223-110-093.

Insignificant Combustion Sources (fuel burning equipment for process heat < 5 MMBtu/hr, fuel burning equipment for building heat < 10 MMBtu/hr)

1. Applicable Requirements

The boilers were initially permitted under Construction Permits 86WE191-1 and 2. The boilers were installed in 1988, prior to the June 9, 1989 applicability date of New Source Performance Standard Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units). The make-up air heaters were permitted under Colorado Construction Permit 92WE1354. The salient features of the Construction Permits for the boilers and heaters were incorporated into the facility-wide Construction Permit 95WE195.

The facility has numerous combustion sources that qualify as insignificant activities under Colorado Regulation No. 3, Part C, Section II.E.3. The grouping of the natural gas fired combustion equipment allows easier monitoring and reporting of the emissions since there is just one fuel meter for the entire facility. The facility-wide emission limits set by Colorado Construction Permit 95WE195 relevant to this source are:

NO_x: 82.2 TPY
CO: 46.0 TPY
VOC: 245.0 TPY
PM: 11.0 TPY
PM_{10}: 11.0 TPY
Natural gas use limited to 912 MMscf/yr
20% Opacity limitation (Colorado Regulation No. 1, Section II.A.1)
30% Opacity limitation (Colorado Regulation No. 1, Section II.A.4)

The fuel burning equipment is subject to the maximum allowable particulate emissions standard set by the Colorado Regulation No. 1, Section III.A.1.b equation:

$$PE = 0.5(FI)^{-0.26}$$

Where: PE = Allowable Particulate emissions (lb/MMBtu)
FI = Fuel Input (MMBtu/hr)

2. Emission Factors

Emissions from boilers and heaters are produced during the combustion process, and are dependent upon the specific properties of the natural gas being burned. The AP-42 (EPA Compilation of Air Pollutant Emission Factors, March 1998) emission factors for small boilers from Tables 1.4-1 and 2, adjusted to 1,000 Btu/scf, are listed below:

Pollutant	AP-42 Emission Factor (lb/MMscf)
NO_x	98
CO	82
VOC	5.4
SO_2	0.6
PM	7.5
PM_{10}	7.5

3. Monitoring Plan

The emissions calculations are performed on a monthly basis. This is consistent with the gas-fired boiler monitoring grid developed by the Division (attached).

Monthly emissions from these emission units are summed with the monthly emissions from other emission units and a twelve month running total of facility-wide emissions is maintained to verify compliance with the annual emission limitations. Each month, a new twelve month total is calculated using the previous twelve months data.

At the largest design fuel input rate of 13.1 million Btu per hour and a natural gas heating value of 1000 Btu per standard cubic foot, the most stringent allowable Particulate Matter (PM) emission standard (PE) and the maximum PM emissions from natural gas combustion were determined (see equations below). The maximum PM emissions from combustion are 0.0075 lb PM/MMBtu, which is well below the PE of 0.26 lb PM/MMBtu.

Permit Limit:

$$PE = 0.5(13.1)^{-0.26} = \frac{0.26 \text{ lb PM}}{\text{MMBtu}}$$

Emission Factor:

$$\frac{\text{lb PM}}{\text{MMBtu}} = \frac{7.5 \text{ lb PM}}{\text{MMscf}} \text{ X } \frac{\text{MMscf}}{1000 \text{ MMBtu}} = \frac{0.0075 \text{ lb PM}}{\text{MMbtu}}$$

The opacity standard of 20% will be monitored by the use of natural gas. The Division does not believe opacity is an issue when natural gas is combusted. However, inspectors may verify this with EPA Method 9 opacity readings if necessary.

4. Compliance Status

The APENs were updated with the renewal application. These units are currently considered to be in compliance with all applicable requirements.

CAN FORMING OPERATIONS

1. Applicable Requirements

Construction Permit 95WE195 was issued as a facility-wide permit. The equipment grouped under the can forming operations and the previous Colorado Construction Permit issued for each equipment unit prior to the issuance of the facility-wide permit are described below. As discussed earlier in this review document, the aluminum scrap handling was been separated from the can forming operation and is addressed a separate source.

Equipment	Control Equipment	Previous Permit No.
Standun Bodymakers, Model B318, and S/Ns: 72501-72506, and Oil Mist Lubrication System for Beverage Can Body Presses for Line No. 1.	Balston Units #1 and #2, Mist Eliminators (Model R-3080), with Airpro Filters (Model 200) and Air Make-up Units.	86WE191-4
Standun Bodymakers, Model B318, and S/Ns: 725120, 725110, 725100, 725090, 725080, 72507, and Oil Mist Lubrication System for Beverage Can Body Presses for Line No. 2.	Balston Units #3 and #4, Mist Eliminators (Model R-3080), with Airpro Filters (Model 200) and Air Make-up Units.	92WE399-1
Can Elevators for Lines No. 1 and No. 2	Two (2) - Wet Can Inverter Mist Filters.	92WE399-2

The following facility-wide emission limits set by Colorado Construction Permit 95WE195 relevant to this source are:

VOC: 245.0 TPY
PM: 11.0 TPY
PM_{10}: 11.0 TPY

2. Emission Factors

Can forming operations emissions consist of Particulate Matter (PM) and Particulate Matter smaller than 10 microns (PM_{10}) from the can elevator exhaust and the oil mist lubrication systems. The Division-approved emission factors for each activity are listed below:

Activity	PM Emission factors = PM_{10} Emission Factors
Oil Mist Lubrication System	0.10 lb/hr per production line
Can Elevator Exhaust	0.10 lb/hr per production line

The emission factors for the oil mist lubrication system and the can elevator were determined from an uncontrolled lubricant aerosol emission rate of 11.2 lb/hr and a lubricant aerosol water content of 94%. The control efficiencies for the mist eliminators with filters and the wet can inverter mist filters are 85% and 87%, respectively.

3. Monitoring Plan

The emissions calculations are performed on a monthly basis. Monthly emissions from this emission unit are summed with the monthly emissions from other emission units and a twelve month running total of facility-wide emissions maintained to verify compliance with the annual emission limitations. Each month, a new twelve month total is calculated using the previous twelve months data.

Control equipment (mist eliminators with filters, and wet can inverter mist filters) inspection and maintenance procedures are used to ensure continuing optimal function of the control equipment for the oil mist lubrication systems and can elevators.

The emissions must comply with the 20% opacity standard. The Division does not believe opacity is an issue for this type of emissions. However, inspectors may verify this with EPA Method 9 opacity readings if necessary

4. Compliance Status

Updated APENs were submitted with the renewal application. This unit is currently considered to be in compliance with all applicable requirements.

Can Coating Operations

1. Applicable Requirements

Construction Permit 95WE195 was issued as a facility-wide permit. The equipment grouped under the can coating operations and the previous Colorado Construction Permit issued for each equipment unit prior to the issuance of the facility-wide permit are described below.

Equipment	Control Equipment	Permit No.
One (1) basecoat and sizecoat bulk storage tank	None	86WE191-5
One (1) inside spray coating storage tank	None	86WE191-6
One (1) overvarnish coating storage tank	None	86WE191-7
Line No. 1 Inside spray and bottom varnish surface coating system: Six (6) inside spray machines, together rated at 16.4 gal/hr, bottom varnish rated at 0.8 gal/hr. Fugitive VOC Emissions.	Mikro-Pulsaire Baghouse	86WE191-16
Line No. 2 Inside spray and bottom varnish surface coating system: Six (6) inside spray machines, together rated at 16.4 gal/hr, bottom varnish rated at 0.8 gal/hr. Fugitive VOC Emissions.	Mikro-Pulsaire Baghouse	86WE191-17
Fugitive VOC Emissions from Clean-up Operations.	None	86WE191-18
One (1) Reynolds, Model DG250 inside spray machine, rated at 1.5 gal/hr (respray defectively coated cans).	Mikro-Pulsaire Baghouse	89WE054
Parts Cleaners: One (1) Safety-Kleen, Model 44 Two (2) Greymills, Model 902-4.	None	90WE455-1
Line No. 1 Decorator system: One (1) decorator, rated at 0.8 gal/hr ink throughput. One (1) overvarnisher coater, rated at 8.4 gal/hr. Fugitive VOC emissions	None	86WE191-14
Line No. 2 Decorator system: One (1) decorator, rated at 0.8 gal/hr ink throughput. One (1) overvarnish coater, rated at 8.4 gal/hr. Fugitive VOC emissions	None	86WE191-15
Line No. 1 Basecoat surface coating system: One (1) Basecoater, rated at 8.7 gal/hr. Fugitive VOC emissions	None	86WE191-12
Line No. 2A Decorator system: One (1) Ragsdale 8-color decorator rated at 0.8 gal/hr ink throughput. One (1) Ragsdale overvarnish unit, rated at 8.4 gal/hr. One (1) Belvac varnish unit rated at 0.8 gal/hr. Fugitive VOC emissions	None	86WE191-13

The following are the applicable requirements for this emission unit:

Colorado Construction Permit 95WE195 facility-wide emission limits relevant to this source:

VOC: 245.0 TPY
PM: 11.0 TPY
PM_{10}: 11.0 TPY

Fugitive emissions control techniques and work practices (Colorado Construction Permit 95WE195, Colorado Regulation No. 7, Section IX.A.7)

20% Opacity limitation (Colorado Regulation No. 1, Section II.A.1)

40 CFR Part 60, Subpart WW, "Standards of Performance for the Beverage Can Surface Coating Industry". (Colorado Construction Permit 95WE195, Colorado Regulation No. 6, Part A, Subpart WW) Section 60.492 of Subpart WW sets the following emission limits, based on volume-weighted calendar-month average emissions:

(A) 0.29 kg of VOC per liter (2.42 pounds per gallon) of coating solids from each two-piece can exterior base coating operation, except clear base coat;

(B) 0.46 kg of VOC per liter (3.83 pounds per gallon) of coating solids from each two-piece can clear base coating operation and from each overvarnish coating operation; and

(C) 0.89 kg of VOC per liter (7.42 pounds per gallon) of coating solids from each two-piece can inside spray coating operation.

40 CFR Part 60, Subpart A "General Provisions" (Construction Permit 95WE195, Colorado Regulation No. 6, Part A, Subpart A)

2. Emission Factors

VOC emissions from the can coating operations are determined by multiplying the mass consumption of each material (coatings, inks, and solvents) and the percent mass of non-exempt VOC in the material. Thus, emissions calculations are based on information in the most current Material Safety Data Sheet (MSDS) for each material.

Most of the overspray from the inside spray and bottom varnish surface coating system are captured by a baghouse. The estimated overspray not captured by the baghouse are considered particulate emissions and are estimated from the equation below:

$$PM = PM_{10} = V \times P \times (1 - \eta_{transfer}) \times \rho \times \eta_{baghouse}$$

Where: V = Volume of inside spray material used
P = Volume of solids per volume of inside spray material

$\eta_{transfer}$ = Transfer Efficiency (80% - from AP-42 for airless spray of flat surfaces)
ρ = Density of solids (from MSDS datasheet)
$\eta_{baghouse}$ = Baghouse control efficiency

In the absence of any credible evidence to the contrary the baghouse control efficiency is considered to be 99% if the baghouse inspection and maintenance procedures as described in Conditions 3.2.1 and 3.2.2 of the Operating Permit are met.

After each coat has been applied (basecoat, decoration, and inside spray/bottom varnish), the can is dried in a drying/curing oven. The ovens are rated at less than 5 MMBtu/hr and fall under the insignificant activity category of Colorado Regulation No. 3, Part C, Section II.E.3.k. As discussed earlier in this review summary, there is only one gas meter for the facility. For ease of monitoring and reporting all the natural gas combustion emissions are reported, included these insignificant emissions.

3. Monitoring Plan

The emission calculations are performed on a monthly basis with semi-annual monitoring reports and an annual compliance certification. Metal Container records coating, ink, and cleanup material usage on a weekly basis and can production rate daily to calculate the daily usage rates and VOC emissions.

Monthly emissions from this emission unit are summed with the monthly emissions from other emission units and a twelve month running total of facility-wide emissions is maintained to verify compliance with the annual emission limitations. Each month, a new twelve month total shall be calculated using the previous twelve months data.

Calculations to determine compliance with NSPS standards follow the emission rate calculation requirements as stated in Federal 40 CFR 60.493.

The source is required to utilize fugitive control techniques and work practices to minimize fugitive VOC emissions.

Baghouse inspection and maintenance procedures are used to ensure continuing optimal functioning of the control equipment for each of these processes. This emission unit is required to comply with the opacity standard of 20%. Inspectors may verify this with EPA Method 9 opacity readings, if necessary.

4. Compliance Status

This unit is currently considered to be in compliance with all applicable requirements.

Aluminum Scrap Processing

1. Applicable Requirements

The aluminum scrap handling system was initially permitted under Construction Permit 86WE191-8, and then inadvertently permitted again under Construction Permit 96WE060 when the emission factor for this system was revised. Thus, this aluminum handling system was at one point permitted under two Colorado Construction Permits. Because of this error, the system was referenced twice in Construction Permit 95WE195, implying that there were two aluminum scrap handling systems in the facility. The provisions of Construction Permit 96WE060 were incorporated into the facility-wide Construction Permit 95WE195 and this Operating Permit.

The facility-wide emission limits set by Colorado Construction Permit 95WE195 relevant to this source are:

PM:	11.0 TPY
PM_{10}:	11.0 TPY
Aluminum scrap processed	4,500 TPY

20% Opacity limitation (Colorado Regulation No. 1, Section II.A.1)
30% Opacity limitation (Colorado Regulation No. 1, Section II.A.4)

2. Emission Factors

The Division-approved emission factor for the aluminum scrap processing is 0.45 pounds per ton of aluminum scrap processed. The particulate emissions are controlled by a Bloapco cyclone with a rated removal efficiency of 85%.

3. Monitoring Plan

The emission calculations are made on a monthly basis, with semi-annual monitoring reports and an annual compliance certification.

Monthly emissions from this emission unit are summed with the monthly emissions from other emission units and a twelve month running total of facility-wide emissions maintained to verify compliance with the annual emission limitations. Each month, a new twelve month total is calculated using the previous twelve months data.

The scrap is processed through a Bloapco cyclone that is part of the material processing and not provided for the control of particulate emissions. Metal Container takes the position that the material processed by the cyclone is of sufficient size that the material does not leave the cyclone. Any material lost from the cyclone represents material lost from production. Inspection and maintenance procedures are used to ensure continuing optimal functioning of the scrap processing equipment. The cyclone air stream discharge is easily visible from the ground and any visible emissions would be readily noted and indicate a serious malfunction of the equipment. Visible emissions have not been noted to date. Metal Container requested there be no requirement for opacity monitoring. based on the history of no visible emissions, the nature of the material processed and that the cyclone is part of the processing equipment and not an emissions control device. The Division accepts the Metal Container position.

4. Compliance Status

Updated APENs were submitted with the renewal application. This unit is currently considered to be in compliance with all applicable requirements.

Temporary Diesel Engine/Compressor Unit

This unit is rented when needed while maintenance is performed on the electric powered compressors. The unit may not be needed every year, and normally operates for about five (5) days when used. Metal Container estimated the emissions based on a conservative worst-case scenario and found the associated emission levels required a permit.

1. Applicable Requirements - The applicable requirements were established directly in this Operating Permit in accordance with Section I, Condition 1.3 of this Operating Permit. The due date of the first semi-annual monitoring and deviation report required by this Operating Permit will be more that 180 days after the initial approval of the modification of Construction Permit 95WE195 was issued/or the equipment commenced operation. Therefore, under the provisions of Colorado Regulation No. 3, Section V.A.2, the Division is allowing the initial approval construction permit to continue in full force and effect and will consider the Responsible Official certification submitted with that report to serve as the demonstration required pursuant to Colorado Regulation No. 3, Part B, Section IV.H and no final approval construction permit will be issued. The appropriate provisions of the initial approval construction permit have been directly incorporated into this Operating Permit.

The facility-wide emission limits set by Colorado Construction Permit 95WE195 relevant to this source are:

NO_x:	82.2 TPY
CO:	46.0 TPY
VOC:	245.0 TPY
SO2	4.9 TPY
PM:	11.0 TPY
PM_{10}:	11.0 TPY

20% Opacity limitation (Colorado Regulation No. 1, Section II.A.1)
30% Opacity limitation (Colorado Regulation No. 1, Section II.A.4)

2. Emission Factors - The Division-approved emission factors from AP-42 Table 3.3-1 (ver 10/96) and 3.4-1 (ver 10/96) are listed below. Metal Container's experience has been that the required engine will not exceed 800 horsepower. AP-42 provides different emission factors for diesel engines smaller than 600 horsepower and larger than 600 horsepower. The emission factors selected and identified in the table below include the highest value for the two groups of engines to accommodate the use of any size diesel engine up to 800 horsepower.

Pollutant	Emission Factor
	lb/hp-hr
NO_X	0.031
VOC	0.00247
CO	0.00668
SO_2	0.00405
PM	0.0022
PM_{10}	0.0022

3. Monitoring Plan - The emission calculations are made on a monthly basis, with semi-annual monitoring reports and an annual compliance certification.

Monthly emissions from this emission unit are to be summed with the monthly emissions from other emission units and a twelve month running total of facility-wide emissions maintained to verify compliance with the annual emission limitations. Each month, a new twelve month total is calculated using the previous twelve months data.

This emission unit must comply with the opacity standard of 20%. Inspectors may verify this with EPA Method 9 opacity readings, if necessary. If the engine is needed, it generally operates for about five (5) days. The Division believes the short-term operation of the engine does not justify the requirement for establishing a minimum frequency for opacity observations. However, provisions have been included for requiring Method 9 opacity observations in the event visible emissions are noted during the engine operation.

4. Compliance Status - In the absence of any credible evidence to the contrary, the Division accepts the engine is in compliance.

Insignificant Activities

The source has a facility-wide permit to establish a synthetic minor stationary source status for the Prevention of Significant Deterioration (PSD) provisions by limiting the VOC emissions to a maximum of 245 tons per year. Metal Container is required to track VOC emissions from insignificant activities because the permit limit is within 10% of the major source threshold level. The total contribution from small increases in the VOC emissions from various insignificant activities could be sufficient to not only exceed the permit limits but also exceed the major source threshold. Metal Container must monitor all the insignificant activities that are sources of VOC emissions and calculate their actual annual VOC emissions. The source will be considered a major stationary source for PSD regulations if the total facility-wide VOC emissions, including VOC emissions from insignificant activities, exceed 250 tons per year.

In the Title V Operating Permit Application, submitted February 23, 1996, emission units were identified by Metal Container that qualify as insignificant activities. The emission units are summarized below.

Lime Silo	Inker Cleaner
Oil Separation and holding tanks	Ink Dot Identification System/Clean-up.
Bodymaker coolant storage tank	Hydraulic oil (bodymaker) bulk tank
Washer chemical storage tank	Cupper lube tank
Wastewater treatment tank.	Propane cylinders
Sulfuric Acid Bulk Tank	Diesel storage tank.
Building heaters/water heaters	
Line No. 1 Drying/Curing Ovens Two rated at 1.45 MMBtu/hr One rated at 3.08 MMBtu/hr	Line No. 2 Drying/Curing Ovens Two rated at 1.45 MMBtu/hr One rated at 3.08 MMBtu/hr

Two (2) can washers with natural gas dryers, rated at 3.17 MMBtu/hr

Internal combustion engine powering an emergency water pump

Fourteen (14) natural gas heaters, rated less than 5 MMBtu/hr.

Three (3) natural gas heaters for space heating
One rated at 6.2 MMBtu/hr
Two rated at 7.4 MMBtu/hr

Alternative Operating Scenarios

No alternative operating scenarios were requested.

Permit Shield

No specific regulations were cited by Metal Container Corporation as non-applicable to this source. However, for clarification, the Division included the 40 CFR Part 60 New Source Performance Standard Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units as non-applicable to the source.

Compliance Assurance Monitoring (CAM) Plan

The following emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold. They are therefore subject to the provisions of the CAM program as set forth in 40 CFR Part 64 as adopted by reference into Colorado Regulation No. 3, Part C, Section XIV:

None